



151 Southhall Lane, Ste 450
Maitland, FL 32751
P.O. Drawer 200
Winter Park, FL 32790-0200
www.inteserra.com

March 1, 2018
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: Core Communications, Inc. - 499 Filer ID 831558
Ton80 Communications, LLC – 499 Filer ID 831560
CY2017
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Core Communications, Inc. and its affiliate, Ton80 Communications, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3006 or via email to croesel@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Carey Roesel

Carey Roesel
Consultant

cc:
tms: FCx1801
Enclosures
CR/sp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:

Calendar Year 2017

Name of Companies covered by this certification:

**Core Communications, Inc.
Ton80 Communications, LLC**

**Form 499 Filer ID: 831558
Form 499 Filer ID: 831560**

Name of Signatory:

Bret Mingo

Title of Signatory:

President

I, Bret Mingo, certify and state that

1. I am President of Core Communications, Inc. ("Core") and its affiliate Ton80 Communications, LLC ("Ton80") and, acting as an agent of Core and Ton80, that I have personal knowledge that Core and Ton80 have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*
2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the procedures of Core and Ton80 ensure that Core and Ton80 are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. Core and Ton80 have not taken any actions (i.e., proceedings instituted or petitions filed by Core or Ton80 at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. Core and Ton80 have not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. Core and Ton80 represent and warrant that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. Core and Ton80 also acknowledge that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

DocuSigned by:

Bret Mingo

08EE4AD5632042A...

Bret Mingo, President

3/1/2018

Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Attachment A
Statement of CPNI Procedures and Compliance

Core Communications, Inc.
Ton80 Communications, LLC

Calendar Year 2017

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB DOCKET 06-36

Core Communications, Inc.,
Ton80 Communications, LLC

Statement of CPNI Procedures and Compliance
Calendar Year 2017

Core Communications, Inc. and its affiliate Ton80 Communications, LLC provide this statement pursuant to Section 64.2009(e) of the Federal Communications Commission's rules, 47 C.F.R. 64.2009(e), to summarize the operational procedures and policies in place that are designed to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI") rules. This statement applies equally to each company, which are collectively referred to herein as the "Companies".

The Companies do not obtain, retain or use CPNI, including call detail records, to market any telecommunications services and have trained personnel not to use CPNI for marketing purposes. Should the Companies elect to use CPNI in the future, for marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

Procedures guarding against unauthorized access to CPNI are part of the Companies' regular monitoring of operations. The Companies' employees are prohibited from disclosing CPNI and have procedures which provide for disciplinary action for such violations, up to and including termination of employment. The Companies have implemented language in the employee manual regarding CPNI and the requirements for disclosure. The Companies' Customer Service Manager conducts training and enforcement of training regarding the regulation of customer information.

The Companies do not disclose call record information over the telephone until the customer is verified. The Companies provide its customers with on-line access to CPNI. On-line customers are required to select a username and password to gain access to their account information. In the event of a lost or forgotten password, the Companies do not prompt the customer for readily available biographical or account information, but instead emails information to the email account of record, which allows the customer to reset the password.

Core Communications, Inc
Ton80 Communications, LLC

Statement of CPNI Procedures and Compliance
Calendar Year 2017
(Page 2)

The Companies notify customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information), password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Companies do not have any retail locations and therefore do not disclose call detail records in-store.

Requests for call detail records by law enforcement agencies are only granted under subpoena.

The Companies have procedures to notify law enforcement in the event of a breach of customers' CPNI, including call detail records, to ensure that notification is provided in the time period set forth in the FCC's rules, or if applicable, when so authorized by law enforcement. In addition, the Companies have a process to record all breaches discovered and will provide notification to the United States Secret Service, FBI and customers, to the extent possible.

The Companies did not take any actions against data brokers in the last year.

The Companies did not receive any complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI, including call detail records, in calendar year 2017.

The Companies have not developed any information with respect to the processes pretexters are using to attempt to access CPNI or call detail records.